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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

M 12- 155

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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(21 U.S.C. §§ 952(a)
and 960)

JOSE LUIS RODRIGUEZ,

Defendant.

- - - - -X

EASTERN DISTRICT OF NEW YORK, SS:

GREGORY BROOKS, being duly sworn, deposes and states that he is a Special Agent of the United States Department of Homeland Security, Homeland Security Investigations, duly appointed according to law and acting as such.

Upon information and belief, on or about February 11, 2012, within the Eastern District of New York and elsewhere, defendant JOSE LUIS RODRIGUEZ did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a) and .
960).

The source of your deponent's information and the grounds for his belief are as follows:¹

1. On or about February 11, 2012, the defendant JOSE LUIS RODRIGUEZ arrived at John F. Kennedy International Airport ("J.F.K. Airport") in Queens, New York, aboard Jet Blue Flight No. 840 from Santiago, Dominican Republic.

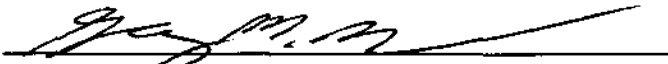
2. The defendant JOSE LUIS RODRIGUEZ was selected for a Customs and Border Protection ("CBP") examination. The defendant presented for inspection one black "Clipper Club" suitcase. The defendant claimed ownership of the bag and its contents.

3. During an inspection of the defendant's suitcase, a CBP officer observed that the sides of the suitcase felt unusually thick. Further examination revealed that the sides of the suitcase contained a white powdery substance, which field-tested positive for the presence of cocaine.

4. The total approximate gross weight of the cocaine found in the defendant JOSE LUIS RODRIGUEZ's suitcase is 6.7 kilograms.

^{1/} Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause, I have not described all the relevant facts and circumstances of which I am aware.

WHEREFORE, your deponent respectfully requests that
defendant JOSE LUIS RODRIGUEZ be dealt with according to law.


GREGORY BROOKS
Special Agent
U.S. Department of Homeland Security
Homeland Security Investigations

Sworn to before me this
11th day of February, 2012

UNITED STATES
EASTERN DISTRICT OF

